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Attorneys for Defendant Arise Virtual Solutions, Inc.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAVION DE NIRO, Individually, and on
behalf of similarly situated individuals,

Plaintiff,

v.

ARISE VIRTUAL SOLUTIONS, INC.,,

Defendant.

Case No.: 2:24-CV-00695-APG-EJY

**REVISED JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
MOTION AND RESPOND TO
COMPLAINT (FIRST REQUEST)**

Plaintiff Davion De Niro, individually, and behalf of similarly situated individuals (“Plaintiff”) and Defendant Arise Virtual Solutions Inc. (“Defendant” or “Arise”) (collectively the “Parties”), by and through their counsel of record, hereby enter the following stipulation, which is the first stipulation to extend time filed with respect to the subject matter herein:

1. On April 10, 2024, Plaintiff filed both the Complaint in the instant lawsuit [Dkt. No. 1] and a Motion for Conditional Certification [Dkt. No. 5];
2. On April 11, 2024, Arise was served with the Summons and Complaint, along with the Motion for Conditional Certification;

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3. Pursuant to the operative rules, Arise has until April 25, 2024, to respond to Plaintiff's Motion for Conditional Certification, and until May 2, 2024, to respond to Plaintiff's Complaint;
4. Both parties have agreed to a one-week extension of time for Arise to respond to Plaintiff's Motion for Conditional Certification and a one-week extension of time to respond to Plaintiffs' Complaint;
5. Pursuant to LRIA 6-1(a), the reason for the extension is that Arise has not yet appeared in this matter, and has had to arrange for local counsel and needs additional time given the fact that the case was initiated less than a month ago to respond to the Motion for Conditional Certification and Complaint;

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. The deadline for Arise to respond to Plaintiff's Motion for Conditional Certification will be extended to and including May 2, 2024;
2. The deadline for Arise to respond to Plaintiff's Complaint shall be extended to and including May 9, 2024; and
3. This Stipulation addresses timing only and is without prejudice to any of the Parties' positions, arguments, allegations, defenses, and/or rights in this matter.

DATED April 26, 2024

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/s/ Dora V. Lane

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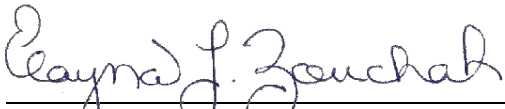
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: April 29, 2024